



Order Filed on April 18, 2017
by Clerk
U.S. Bankruptcy Court
District of New Jersey

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

**TRENK, DiPASQUALE,
DELLA FERA & SODONO, P.C.**
427 Riverview Plaza
Trenton, NJ 08611
(609) 695-6070
(609) 695-6071 (facsimile)
Andrea Dobin
Michele M. Dudas
Counsel to Andrea Dobin, Chapter 7 Trustee

In re:

RONALD J. RASLOWSKY,

Debtor.

Chapter 7

Case No. 16-13754 (KCF)

Honorable Kathryn C. Ferguson, Chief Judge

Hearing Date: April 11, 2017

Hearing Time: 10:00 a.m.

**CONSENT ORDER RESOLVING SECOND MOTION OF RONALD J. RASLOWSKY,
CHAPTER 7 DEBTOR, TO CONVERT CASE TO CHAPTER 11**

The relief set forth on the following pages, numbered two (2) through four (4), is hereby
ORDERED.

DATED: April 18, 2017


Honorable Kathryn C. Ferguson
United States Bankruptcy Judge

(Page 2)

Debtor: Ronald J. Raslowsky

Case No.: 16-113754 (KCF)

Caption of Order: Consent Order Resolving Second Motion of Ronald J. Raslowsky, Chapter 7 Debtor, to Convert Case to Chapter 11

THIS MATTER, having been presented to the Court by Andrea Dobin, Chapter 7 Trustee (“Trustee”) for Ronald J. Raslowsky, Chapter 7 debtor (the “Debtor”), by and through her counsel, Trenk, DiPasquale, Della Fera & Sodono, P.C., upon the filing of a Notice of Abandonment (“Notice”) with respect to the real property jointly owned by the Debtor and Maria Geletei (“Ms. Geletei”) located at 2226 Ponybrook Way, Toms River, New Jersey (“Property”); and the Debtor having filed an Objection to the Notice and a second Motion to convert the within proceeding to a Chapter 11 (“Motion”); and the Trustee having objected to the Motion; and the parties having resolved their differences regarding the Notice, the Motion and have reached a global settlement regarding certain outstanding issues, with an intended goal of having all claims, including administrative claims, paid in full ; and for good cause shown, it is hereby

IT IS HEREBY STIPULATED AND AGREED that:

1. The Trustee will withdraw the Notice without prejudice. Within sixty (60) days from entry of this Consent Order, the Debtor, at his own cost, complete improvements to the Property intended to improve its value, including, but not limited to, sodding the lawn, power washing the house, having furnaces and other systems inspected and, if necessary, repaired. The Debtor will pay real estate taxes for the Property from the date hereof until the Property is sold or abandoned, will maintain casualty and liability insurance in appropriate amounts, in which the Trustee will be named as additional insured.

2. Once completed, the Trustee will re-list the Property for sale in an amount which will generate a distribution for creditors of the Estate. If the Property is not under contract at an acceptable price by November 1, 2017, the Trustee, at her discretion may initiate a process

(Page 3)

Debtor: Ronald J. Raslowsky

Case No.: 16-113754 (KCF)

Caption of Order: Consent Order Resolving Second Motion of Ronald J. Raslowsky, Chapter 7 Debtor, to Convert Case to Chapter 11

intended to result in abandonment of the Property. Debtor will not object to the Trustee's abandonment of the Property at that time.

3. Within thirty (30) days from entry of this Consent Order, the Debtor will take personal title to the condominium in Florida (the "Florida Property") which is currently titled in the name of Lorraine Raslowsky Trust, of which the Debtor is the sole beneficiary. The Debtor will provide proof of payment of all condominium dues and assessments associated with the Florida Property, and proof of casualty and liability insurance on the Florida Property with acceptable coverage limits which names the Trustee as additional insured. So long as the Debtor complies with these requirements, the Florida Property will be the last asset to be sold by the Trustee and will only be sold if the other assets do not generate enough proceeds to satisfy all claims in full.

4. The Debtor will actively pursue the issuance of replacement titles by the State of New Jersey, Motor Vehicle Commission for the antique Police Car, the Ford Mustang and Harley Davidson motorcycle. Upon receipt of the titles, the Trustee will conduct an auction for the sale of the vehicles. Nothing herein prohibits the Debtor or an affiliate from bidding on the vehicles at the auction.

5. As soon as possible, the Debtor will seek to modify any restraining orders entered by the Superior Court of New Jersey, Domestic Violence Unit, enabling the Debtor's access to the Property. Provided he obtains such modification, he may reside at the Property until it is sold by the Trustee. If he cannot receive a modification of this state court Order, the Debtor will

(Page 4)

Debtor: Ronald J. Raslowsky

Case No.: 16-113754 (KCF)

Caption of Order: Consent Order Resolving Second Motion of Ronald J. Raslowsky, Chapter 7 Debtor, to Convert Case to Chapter 11

provide the Trustee with a proposal as to how he intends to comply with Paragraph 1 hereof without being able to gain access to the Property.

6. Within thirty (30) days from entry of this Consent Order, the Debtor will file a motion to reduce and/or expunge the claim of Ms. Geletei and negotiate other claims filed in this bankruptcy proceeding.

7. The Debtor will present a buyer for the furniture remaining at the Property, or will be responsible for removing it prior to any sale.

8. On or before April 14, 2017, Debtor will produce information relating to any lawsuit in which he was the beneficiary relating to his father's estate, including but not limited to information relating to any claims made and settlement monies received. Failure to provide such information is a basis on which to revoke the Debtor's discharge pursuant to 11 U.S.C. §727(a)(6).

9. The Debtor will cooperate with the Trustee and her requests made in the within Chapter 7 proceeding.

10. Nothing contained herein is a waiver or release by the Trustee to pursue any other disclosed or undisclosed, known or unknown assets of the Debtor.

**TRENK DIPASQUALE
DELLA FERA SODONO, P.C.**
Attorneys for Andrea Dobin, Chapter 7 Trustee

**BROEGE, NEUMANN, FISCHER
& SHAVER, LLC**
Attorneys for Ronald J. Raslowsky,
Chapter 7 Debtor

By: /s/ Michele M. Dudas
Michele M. Dudas, Esq.

By: /s/ Timothy P. Neumann
Timothy P. Neumann, Esq.